

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

-----X	
In re:	: Chapter 11
	:
Glyn Neal Owen	: No. 25-11132-KHK
	:
Debtor.	:
	:
-----X	

MOTION TO EXTEND AUTOMATIC STAY

The Debtor hereby moves this Court, pursuant to section 362(c)(3)(B), for an order continuing the automatic stay provided under section 362(a) as to all creditors. In support of this motion, the Debtor states as follows:

1. The Debtor filed the petition in this case under chapter 11 on June 4, 2025.
2. The Debtor had previously filed a chapter 13 case in this Court on May 13, 2024 (No. 24-10897), which was dismissed on October 22, 2024. The case was technically dismissed because confirmation of the plan was denied, but in fact the reason was that the Debtor was determined to be ineligible to be a debtor under Chapter 13 due to exceeding the debt limits.
3. The petition in the current case has been filed in good faith as to all creditors. The Debtor believes that he will be able to confirm and complete a plan in this case. The Debtor has stable employment, as does his wife, and he believes that a plan is feasible.

Daniel M. Press, VSB# 37123
Chung & Press, P.C.
6718 Whittier Ave., Suite 200
McLean, Virginia 22101
(703) 734-3800
Counsel for Debtor

4. The Debtor's prior chapter 13 case, dismissed on October 22, 2024, was the only previous case by the Debtor pending within the preceding year. Debtor filed all required documents in the prior case, no required adequate protection payments were ordered, and he did not fail to perform the terms of any confirmed plan as no plan was confirmed. The Debtor's financial affairs have materially changed in that many of his smaller debts have been paid, and he has now retained Chapter 11 counsel and is prepared to proceed under Chapter 11, for which he is eligible, and Debtor expects to conclude this case with a confirmed plan that will be fully performed. No motion for relief from stay was filed in the prior case. Accordingly, there is no presumption that the case was not filed in good faith under § 362(c)(3)(C).

WHEREFORE, the Debtor requests that this court continue the automatic stay under section 362(a) as to all creditors for the duration of this chapter 11 proceeding.

Dated: June 5, 2025.

Respectfully submitted,

/s/Daniel M. Press
Daniel M. Press, VSB# 37123
CHUNG & PRESS, P.C.
6718 Whittier Avenue, Suite 200
McLean, Virginia 22101
dpress@chung-press.com
(703) 734-3800

DECLARATION OF GLYN OWEN

I, Glyn Owen, declare and state as follows:

1. I am of legal age and competent to testify.
2. I have reviewed the foregoing Motion and all factual averments therein are true and correct.

I declare under penalty of perjury that the foregoing is true and correct.
Executed on June 4, 2025.

/s/ Glyn N. Owen
Glyn N. Owen

CERTIFICATE OF SERVICE

This is to certify that on this 5th day of June, 2025, I caused the foregoing Motion to be served by CM/ECF on the US Trustee and by first-class mail, postage pre-paid upon all creditors on the attached matrix, and upon:

CGH Technologies, Inc.
INCORP SERVICES, INC., Reg. Agt.
7288 Hanover Green Dr Ste A
Mechanicsville, VA, 23111 - 1709

/s/Daniel M. Press
Daniel M. Press

Label Matrix for local noticing

United States Bankruptcy Court

AEC MTRR

0422-1

200 South Washington Street

PO Box 575

Case 25-11132-KHK

Alexandria, VA 22314-5405

Blue Ridge Summit, PA 17214-0575

Eastern District of Virginia

Alexandria

Thu Jun 5 12:07:53 EDT 2025

Bank of America

CGH Technologies

Charles A Dean

PO Box 15284

400 Virginia Avenue

Gross, Romanick, Dean & DeSimone, P.C.

Wilmington, DE 19850-5284

Sub Tenant Suite 700B

3975 University Drive Suite 410

Washington, DC 20024-2986

Fairfax, VA 22030-2520

Compton & Duling

Deliese Owen

Internal Revenue Service

12701 Marblestone Dr

1131 Tournai Ct

PO Box 7346

Woodbridge, VA 22192-8327

Woodbridge, VA 22191-3253

Philadelphia, PA 19101-7346

Rocket Mortgage

Truist Bank

Daniel M. Press

1050 Woodward Avenue

PO Box 1874

Chung & Press, P.C.

Detroit, MI 48226-3573

Wilson, NC 27894-1874

6718 Whittier Ave., Suite 200

McLean, VA 22101-4531

Glyn Neal Owen

Matthew W. Cheney

End of Label Matrix

1131 Tournai Court

Office of the U.S. Trustee - Region 4

Mailable recipients 13

Woodbridge, VA 22191-3253

1725 Duke Street

Bypassed recipients 0

Suite 650

Total 13

Alexandria, VA 22314-3489